

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORIES  
(APWU/USPS-T4-2(a)-(h), 3-6, AND 7(a)-(c))  
(January 12, 2012)**

The United States Postal Service hereby provides the responses of witness Neri (USPS-T-4) to the above-listed interrogatories of the American Postal Workers Union, AFL-CIO, dated December 29, 2011. Each interrogatory is stated verbatim and followed by the response. Interrogatory APWU/USPS-T4-7(d) has been redirected to the Postal Service for response, and Interrogatory APWU/USPS-T4-9 has been redirected to Postal Service witness Bratta (USPS-T-5) for response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
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**APWU/USPS-T4-2** On page 16 of your testimony you state that the proposed network and relaxed expectations of overnight service would “narrow the 2-day delivery range and enlarge the 3-day delivery range, which is anticipated to generate significant improvement in operating efficiency.” Since the measure of customer expectations is keyed to actual mail delivery rather than service standard day ranges please provide the following information.

- a) What percentage of First Class mail is actually delivered in one day now?
- b) What percentage of First Class mail is actually delivered in two days now?
- c) What percentage of First Class mail is actually delivered in three days now?
- d) What percentage of First Class mail would be expected to actually be delivered in two days under the proposed plan?
- e) What percentage of First Class mail would be expected to actually be delivered in three days under the proposed plan?
- f) What percentage of Periodical mail is actually delivered in one day now?
- g) What percentage of Periodical mail is actually delivered in two days now?
- h) What percentage of Periodical mail is actually delivered in three days now?

**RESPONSE:**

- (a) In the fourth quarter of Fiscal Year 2011, 44.9 percent of all First-Class Mail is estimated to have been delivered in 1 delivery day.
- (b) In the fourth quarter of Fiscal Year 2011, 33.4 percent of all First-Class Mail is estimated to have been delivered in 2 delivery days.
- (c) In the fourth quarter of Fiscal Year 2011, 18.6 percent of all First-Class Mail is estimated to have been delivered in 3 delivery days.
- (d-e) Please see the Postal Service response to DBP/USPS-2[b].
- (f) Based on data regarding Periodicals Mail with Full-Service Intelligent Mail barcodes, 26.6 percent of Periodicals Mail is estimated to have been delivered in 1 delivery day in the fourth quarter of Fiscal Year 2011.

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**RESPONSE to APWU/USPS-T4-2 continued:**

(g) Based on data regarding Periodicals Mail with Full-Service Intelligent Mail barcodes, 32.6 percent of Periodicals Mail is estimated to have been delivered in 2 delivery days in the fourth quarter of Fiscal Year 2011.

(h) Based on data regarding Periodicals Mail with Full-Service Intelligent Mail barcodes, 17.3 percent of Periodicals Mail is estimated to have been delivered in 3 delivery days in the fourth quarter of Fiscal Year 2011.

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**APWU/USPS-T4-3** What impact would the proposed plan have on the actual delivery profile of Priority Mail compared to its actual delivery profile now?

**RESPONSE:**

The impact will depend upon the results of the individual AMP studies.

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**APWU/USPS-T4-4** What impact would the proposed plan have on the actual delivery profile of Express Mail compared to its actual delivery profile now?

**RESPONSE:**

Please see the response to APWU/USPS-T4-3.

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**APWU/USPS-T4-5** What impact would the proposed plan have on the actual delivery profile of Standard Mail compared to its actual delivery profile now?

**RESPONSE:**

Please see the response to APWU/USPS-T4-3. Hypothetical changes are depicted in USPS Library Reference N2012-1/8.

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**APWU/USPS-T4-6** What impact would the proposed plan have on the actual delivery profile of parcels compare[d] to the actual delivery profile now?

**RESPONSE:**

Please see the response to APWU/USPS-T4-3. Hypothetical changes are depicted in USPS Library Reference N2012-1/8.

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**APWU/USPS-T4-7** On page 16 of your testimony you state “presorted First-Class Mail for a mail processing facility’s service area, entered by commercial mailers at co-located BMEU facilities (that is, BMEUs located at mail processing facilities) which meet the CAT at the co-located BMEU and the CET at the mail processing facility would be processed for the next day’s delivery.”

a) Would this mail need to be presorted to the 5-digit level for the facility’s service area to qualify?

b) What percentage of current presorted First-Class Mail do you estimate would qualify for this treatment?

c) What percentage of current commercial customers of presorted First Class mail do you estimate would be able to meet these requirements?

**RESPONSE:**

(a) Please see the Postal Service response to DBP/USPS-9[a].

(b-c) Please see the Postal Service response to DBP/USPS-2[b].